

September 30, 2004

Ms. Tracie Billington  
Division of Planning and Local Assistance  
Department of Water Resources  
P. O. Box 942836  
Sacramento, CA 94236-0001

RE: INTEGRATED REGIONAL WATER MANAGEMENT GRANT PROGRAM  
GUIDELINES

Dear Ms. Billington;

On behalf of the Marin Municipal Water District I am pleased to offer comments on the proposed guidelines for grant programs for integrated regional water management (IRWM) plans under Chapter 8 of Proposition 50 dated August, 2004. I would also like to commend the staff members of the Department of Water Resources and the State Water Resources Control Board for developing a very thorough and effective guidelines document.

Comments on the Proposed Guidelines

**1. Local Matching Fund Requirements (Section II. C.):** The state intends to require local matching funds of 50% for planning grants and 10% for implementation grants. We support the local matching fund requirement as stated in the guidelines and would like to confirm that local expenditures directly related to developing the IRWM Plan or implementing a project under the plan and incurred since voter approval of Proposition 50 in 2002 can be included as part of the local match. We also ask that any federal funding available for the project be considered as local matching funds under the program.

**2. Statewide Priorities (Section II. E.):** The guidelines indicate that preference will be given to projects that assist in meeting statewide priorities as listed. We recommend that the list of statewide priorities be expanded to include the following:

- Increase the security and reliability of water sources for urban, agricultural and environmental uses.
- Protect and restore wetlands and habitat for threatened or endangered fish species.

**3. Eligibility Requirements (Section III. B.):** Proposed guidelines require that applications for implementation projects be consistent with an adopted IRWM plan. A waiver is allowed if the applicant can show that a plan will be adopted by 1/1/2007 and the project contributes to objectives of a draft IRWM plan. We support the state in granting waivers for applicants that demonstrate a list of plan objectives and include a schedule for completion of a plan by 1/1/07. We would ask that no further conditions or requirements for a waiver be added.

**4. Designation of Regions (Appendix A, Item B):** We support the comments made by Department of Water Resources staff at the workshops that the definition of a region, for the purposes of developing IRWM plans, is best done by the entities that are conducting

the joint planning effort. As noted in the Introduction to the guidelines, SB 1672 (Costa, Chapter 767, Statutes of 2002) defines an integrated water management group to consist of at least three agencies, two of which have statutory authority over water. This requirement is further noted in the summary list at the end of Appendix A.

As noted in the guidelines, not all of the water management elements listed in Table A-1 may be addressed in every regional plan, because the plan may be developed to address a particular directly-connected set of water management elements that are of high priority for the entities in the region. Consequently, due to the varied nature of management of the water system elements contained in Table A-1, some regions and their associated regional plans may overlap other regions. DWR and the SWRCB should recognize this state of affairs and allow entities to participate in more than one region, and propose projects related to these different regional plans, as may be appropriate geographically or hydrologically.

To elucidate this comment, take an example of a combined wastewater and water supply entity that imports water from another watershed. This entity may want to coordinate watershed protection activities in the area of origin of imported water with the land use planning agency, the stormwater management agency and other stakeholders to promote and submit for funding a potential project to reduce the impact of invasive species. The region that these agencies would define for the purposes of conducting this watershed (integrated water resources) management planning would be the watershed or watersheds relevant to the projects, which may overlap in part the distribution area of the water/wastewater agency. The water management elements relevant to this effort would be a subset of those in Table A-1.

This water/wastewater agency may also want to participate in and submit for funding a project to reduce water quality impacts from nonpoint source pollution in the waterbody into which it discharges its effluent, and the appropriate region for that planning effort would be the watershed of the receiving waters, which may be a subregion of or may overlap the region in which the watershed protection activities mentioned in the previous paragraph would be conducted. The water management elements from Table A-1 relevant to this integrated water resources planning activity would be a different subset than those in the previous paragraph.

In the above example, DWR and the SWRCB would receive two regional plans and two project proposals that would have the water/wastewater agency in common, and would cover regions that would overlap geographically. This set of circumstances is consistent with the intent and content of Proposition 50 and with the proposed guidelines, and should be accepted by DWR and the SWRCB.

Thank you for your consideration of these comments. If you have questions or require further information, please feel free to call me at (415) 945-1446.

Sincerely,

Paul Helliker  
General Manager